

WILLIAM A. SOKOL, Bar No. 072740
LINDA BALDWIN JONES, Bar No. 178922
WEINBERG, ROGER & ROSENFELD
A Professional Corporation
1001 Marina Village Parkway, Suite 200
San Francisco, CA 94541
Telephone: 510.337.1001
Facsimile: 510.337.1023

Attorneys for Plaintiff

NANCY L. OBER, Bar No. 49683
LITTLER MENDELSON
A Professional Corporation
650 California Street, 20th Floor
San Francisco, CA 94108.2693
Telephone: 415.433.1940
Facsimile: 415.399.8490
Email: nlober@littler.com

Attorneys for Defendants
REPRO MEDIA and ARNO RUBEN

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

LEE LAHTINEN in his capacity as Trustee
of the SAN FRANCISCO
LITHOGRAPHERS PENSION TRUST,

Plaintiff,

v.

REPRO MEDIA, a California Corporation;
ARNO RUBEN, individually and doing
business as REPRO MEDIA; ARNO
RUBEN, individually,

Defendants.

Case No. C 06 4047 (MEJ)

**STIPULATION AND ~~[PROPOSED]~~
ORDER CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE AND
RELATED DEADLINES**

[L.R. 6-2]

Judge: Honorable Maria Elena James
Ctmm: B, 15th Floor

1 Plaintiff Lee Lahtinen, in his capacity as Trustee of the San Francisco Lithographers
 2 Pension Trust ("Plaintiff"), and Defendants Repro Media, a California Corporation, Arno Ruben,
 3 individually and doing business as Repro Media, and Arno Ruben, individually ("Defendants"),
 4 through their respective counsel, hereby stipulate and request that the Court order that the Initial
 5 Case Management Conference and related deadlines be continued for approximately three months.

6 1. Pursuant to the Court's Order Setting Initial Case Management Conference
 7 and ADR Deadlines, the Initial Case Management Conference in this action is set for September 28,
 8 2006 at 10:00 a.m. Other case management deadlines, including the filing of the ADR Certification,
 9 completion of initial disclosures, and filing of the Case Management Statement, precede and are set
 10 in relation to the Case Management Conference.

11 2. Defendants have only just recently appeared in the action, having filed their
 12 Answer to Complaint for Withdrawal Liability on August 29, 2006.

13 3. The parties wish to explore a possible resolution of this action without the
 14 necessity of further litigation time and expense. To that end, Defendants have informally requested
 15 certain information from Plaintiff. Plaintiff is currently in the process of reviewing Defendant's
 16 request and is amenable to exchanging relevant information as part of the exploration of settlement.
 17 The parties currently anticipate that a short extension of case management deadlines will enable
 18 them to focus their efforts on resolving this matter.

19 4. There have been no previous time modifications related to the Initial Case
 20 Management Conference or related case management activities in this case.

21 5. The parties expect that the requested extension of the date for the Initial Case
 22 Management Conference will have no adverse effect on the schedule for the case. No trial date or
 23 other deadlines have yet been set. The requested extension may facilitate the resolution of the
 24 parties' dispute, and will at a minimum enable the parties to exchange information about their
 25 respective positions that may streamline case management.

26 6. Counsel for the parties would be available for a case management conference
 27 on December 14, 2006 or December 21, 2006.

28

1 Therefore, Plaintiff and Defendants, through their respective counsel, stipulate and
2 agree as follows:

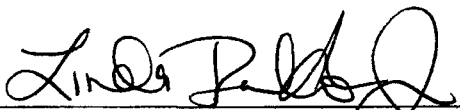
3 1. The Initial Case Management Conference date of September 28, 2006 and
4 related deadlines are vacated.


5 2. The Initial Case Management Conference date is extended to December 14,
6 2006 at 10 a.m.

7 3. Related deadlines for ADR and case management activities are extended
8 accordingly, as provided in the Court's Order Setting Initial Case Management Conference and ADR
9 Deadlines.

10 Dated: September 12, 2006

Dated: September 13, 2006

11 
12 _____
13 LINDA BALDWIN JONES
14 WEINBERG, ROGER & ROSENFELD
15 A Professional Corporation
16 Attorneys for Plaintiff
LEE LAHTINEN IN HIS CAPACITY AS
TRUSTEE OF THE SAN FRANCISCO
LITHOGRAPHERS PENSION TRUST



NANCY L. OBER
LITTLER MENDELSON
A Professional Corporation
Attorneys for Defendants
REPRO MEDIA and ARNO RUBEN

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 25, 2006

Firmwide:81469946.1 052726.1001

